

Application No.: 09/858141

Docket No.: MWS-006

**REMARKS**

Applicant amends claims 1, 12, 20, 25, 26, 31, and 37. Applicant respectfully requests that the Examiner enter the amendments as the amendments are merely correcting some typographical errors. Applicant notes with appreciation that the Examiner deems claims 7-11, 19, 23-24, 29-30, 36, and 41 to recite patentable subject matter. Upon entry of this amendment, claims 1-41 are pending, of which claims 1, 12, 20, 25, 26, 31, and 37 are independent. Applicant respectfully submits that the pending claims define over the art of record.

**Claim Rejections under 35 U.S.C. §103**

The Examiner has made a number of rejections under §103. In particular, claims 1-3, 12-13, 20-22, 25-28, 31-32, and 37-38 are rejected under 35 U.S.C. §103(a) as being unpatentable over United States 6,256,028 to Sanford et al. (hereafter "Sanford") in further view of United States Patent No. 4,819,189 to Kikuchi et al. (hereafter "Kikuchi"). Claims 4-6 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sanford and Kikuchi and further in view of United States Patent No. 5,299,307 to Young (hereafter "Young"). Claims 14, 15, 33, 34, 39, and 40 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sanford and Kikuchi and further in view of United States Patent No. 6,396,488 to Simmons et al. (hereafter "Simmons"). Claim 17 is rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford and Kikuchi and further in view of Simmons and MathWorks Stateflow 3.0.2. Claims 16 and 35 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sanford and Kikuchi and further in view of Simmons and United States Patent No. 4,901,221 to Kodosky et al. (hereafter "Kodosky"). For purposes of simplicity, these rejections will be discussed in aggregate.

Applicant respectfully submits that any combination of Sanford, Kikuchi, Young, Simmons, MathWorks Stateflow 3.0.2, and Kodosky does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims. In other words, a first view is initially displayed showing a level of a hierarchical diagram. Upon the cursor reaching an active region *within* the first view, the first view disappears and is replaced by a second view showing sub-level content

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represented by a graphical reference to the second view within the active region of the first view. The cited prior art references will be discussed individually below followed by an aggregate discussion.

#### The Sanford Reference

Sanford discusses a method and system for accessing web pages of a web site. Applicant agrees with the Examiner that Sanford does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering replacement of the first view with a second view in page 3 of the Office Action. Applicant respectfully submits that Sanford does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims.

#### The Kikuchi Reference

Kikuchi discusses a method and system for managing multiple windows on a display screen. The Examiner contemplates that Kikuchi teaches that upon movement of a cursor to the active region of a second view, represented by the visible portion of an underlying window, with the underlying window representing the second view, the first view, being the displayed window, is replaced by the second view, represented by the underlying window, and the cursor appears in the second view in Fig. 2A and 2B, Col. 5, lines 24-68, and Col. 6, lines 1-14. The Examiner treats a window and a view as equivalent. Applicant respectfully submits that a window and a view are different. A window may have multiple views over time. Applicant respectfully submits that in the claimed invention, a view may show a hierarchical model diagram in a window, a frame, or the like. The pending claims require that the first view represents a level of the hierarchical diagram, and the level includes a graphical reference to a sub-level. When a pointing device enters an active region located within the graphical reference, the sub-level view (second view) is entered and displayed instead of the first view and hence replaces the first view. The cited section in Kikuchi teaches that among multiple windows, which window should be moved to the front of the other windows given the movement of a cursor. Kikuchi merely teaches how to modify the z-order of the windows on a display so that

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the window with the highest z-order would have the focus. One of ordinary skill in the art will appreciate that the window in focus is the window that receives inputs from input devices, such as a keyboard and a mouse. Even if a window and a view is equivalent, Kikuchi does not teach a first window being replaced by a second window. Any of the windows in Fig. 2A and 2B is not replaced by another window, but a first window may be positioned in front of a second window and hence becomes active. However, the second window is still displayed, but only displayed partially and hence it is inactive. Therefore, the second window is not replaced by the first window.

Furthermore, the present invention requires that upon a cursor moving into an active region of a *first* view, the active region automatically triggering *replacement* of the first view with a *second* view. In other words, a cursor is originally in a first view, but upon entering an active region of the first view, a second view replaces the first view. One advantage of the present invention is that the windows management does not need to manage multiple windows. Furthermore, a user may navigate a hierarchical diagram *within* a window and information regarding any sub-levels will appear once an active region of the corresponding sub-level is reached.

However, Kikuchi merely discusses a cursor moving into a visible portion of a separate underlying window and hence making the underlying window active and popped up to the front of all the other windows. Furthermore, in the claimed invention, although a cursor is within an active region corresponding to a second view, the cursor is still within the first view. Additionally, the pending claims further require a graphical reference representing the second view is contained within the first view. However, for Kikuchi, a cursor moving into a visible portion of a separate underlying window (second window) must be *only* in that underlying window (in other words, outside of the first window) in order for the underlying window to pop up and placed before the first window (See col. 7, lines 17-20). Furthermore, Kikuchi also does not teach a graphical reference of a second view within the first view. Additionally, nowhere in Kikuchi does it require that the contents of the first window and the second window to be related. However, in the present invention, it is required in the pending claims that the second view represents a sub-level of the first view. In other words, the present invention, unlike the Kikuchi reference, does not require the cursor to leave the boundaries of the first view in order to trigger

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display of the sub-level (second view). Therefore, Kikuchi does not teach or suggest the element and limitation of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view *representing the sub-level* upon the cursor reaching the active region as required by all the pending claims. Additionally, there is no motivation for Kikuchi to want to replace one window with another window, as the purpose of Kikuchi is to discuss the management of multiple windows.

#### The Young Reference

Young teaches a control method and system for drawing images on a computer display. Young further provides guide lines and guide points to assist in drawing images on a computer display. Nowhere does the Young reference discuss about an active region comprising a portion of the graphical reference automatically triggering *replacement* of said first view with a second view in said display. Applicant respectfully submits that Young does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims.

#### The Simmons Reference

Simmons discusses a system and method for determining a path in a graphical diagram. Simmons further discusses how to record path information and reproduce a copy of the path with the recorded path information. Nowhere does the Simmons reference discuss about an active region comprising a portion of the graphical reference automatically triggering *replacement* of said first view with a second view in said display. Applicant respectfully submits that Simmons does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims.

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The Kodosky Reference

Kodosky teaches a method and system for modeling a process using a block diagram. Nowhere does the Kodosky reference discuss about an active region comprising a portion of the graphical reference automatically triggering *replacement* of said first view with a second view in said display. Applicant respectfully submits that Kodosky does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims.

The MathWorks Stateflow 3.0.2

The cited reference to MathWorks Stateflow 3.0.2 is a print-out of a webpage from MathWorks website advertising the Stateflow 3.0.2 product. However, this MathWorks Stateflow 3.0.2 reference does not teach or suggest the element the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region.

As set forth above, Applicant respectfully submits that any combination of Sanford, Kikuchi, Young, Simmons, MathWorks Stateflow 3.0.2, and Kodosky does not teach or suggest the element of an active region comprising a portion of the graphical reference automatically triggering *replacement* of the first view with a second view in the display, the first view being replaced in the display by the second view representing the sub-level upon the cursor reaching the active region as required by all the pending claims. Accordingly, Applicant respectfully requests that the Examiner reconsiders and withdraws the rejection of the pending claims.

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**CONCLUSION**

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. MWS-006 from which the undersigned is authorized to draw.

Dated: June 29, 2005

Respectfully submitted,

By 

Kevin J. Canning

Registration No.: 35,470

LAHIVE &amp; COCKFIELD, LLP

28 State Street

Boston, Massachusetts 02109

(617) 227-7400

(617) 742-4214 (Fax)

Attorney For Applicant